

1 A. Yes.

2 Q. I just wanted to make sure we were all on
3 the same page. Okay. Let's take a look at your
4 report. Does this report contain all of your
5 opinions in the case?

6 A. Could you clarify?

7 Q. Well, does the report contain -- well, let
8 me put it this way: Does the report contain all of
9 the opinions that you've been asked to give in this
10 case by the Plaintiffs?

11 A. Yes.

12 Q. Well, let's go over some stuff. I notice
13 the first couple of pages talk a little bit about
14 your background and we were also given a copy of your
15 curriculum vitae, so what I'd like to do is come back
16 to that a little bit later. We'll talk about that
17 later.

18 If we could move ahead to page 3. The
19 paragraph that starts in the middle, in addition to
20 this extensive background, you have a list in here of
21 cases you -- where you served as an expert witness?

1 solely on the safety fitness of the carrier.

2 Q. And this is based on your looking at their
3 websites?

4 A. Yes.

5 Q. And you looked at their websites when?

6 A. In preparation for this over the weekend,
7 last Saturday or Sunday.

8 Q. Do you know what their policies were in
9 2004?

10 A. I looked at their policies -- their
11 current policies, so I did not --

12 Q. So you don't know whether that was their
13 requirement back in September of 2004?

14 A. I don't know. That's correct.

15 Q. Let's talk about the Department of Energy,
16 if we could. That was -- oh, let me go back first to
17 page 6. You had stated in here that immediate
18 suspension of business relationships with the carrier
19 having one or more safety evaluation scores with a 75
20 level or above is a frequent occurrence among
21 shippers.